

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARCELORMITTAL NORTH AMERICA
HOLDINGS LLC,

Plaintiff,

v.

ESSAR GLOBAL FUND LIMITED,

Defendant,

and

MESABI METALLICS COMPANY LLC f/k/a
ESSAR STEEL MINNESOTA LLC,

Garnishee.

21 Civ. 6975 (KPF)

**JOINT MOTION TO STAY
PROCEEDINGS PENDING
COMPLETION OF SETTLEMENT
NEGOTIATIONS**

Plaintiff ArcelorMittal North America Holdings LLC, Defendant Essar Global Fund Limited, and Garnishee Mesabi Metallics Company LLC hereby respectfully move this Court to temporarily stay proceedings to complete settlement negotiations.

The parties have reached an in principle confidential settlement agreement to resolve the litigation, and have agreed that this agreement shall become effective following the occurrence of certain events (which are set out in the settlement documentation). The parties anticipate filing a joint stipulation dismissing this case with prejudice once the settlement agreement becomes effective and will update the Court on the status of the settlement agreement on or before 60 days after the entry of the Proposed Order.

The parties therefore respectfully move this Court to stay the proceedings until 60 days after the entry of the Proposed Order. A Proposed Order is attached.

Dated: October 10, 2022
New York, New York

GIBSON, DUNN & CRUTCHER LLP

BY: /s/ Robert L. Weigel
Robert L. Weigel
Robert F. Serio
Jason W. Myatt
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
Tel: (212) 351-4000
Fax: (212) 351-5236
RWeigel@gibsondunn.com

*Attorneys for Plaintiff ArcelorMittal
North America Holdings LLC*

QUINN EMANUEL URQUHART & SULLIVAN, LLP

BY: /s/ Rollo C. Baker
Rollo C. Baker
Todd Beattie
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel: (212) 849-7000
Fax: (212) 849-7000
rollobaker@quinnemanuel.com
toddbeattie@quinnemanuel.com

*Attorneys for Defendant Essar Global
Fund Limited and Garnishee Mesabi
Metallics Company LLC*